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December 12, 2023

BY ECF

The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Bazzi*,
23 Cr. 41 (DLI)

Dear Judge Irizarry:

This letter constitutes the status report with respect to the above-entitled case, in which James Roth, Esq., Abed Hammoud, and I represent defendant Mohammad Bazzi. Following a series of discussions with the government, and significant progress in plea negotiations as a result, the parties respectfully request that the status conference scheduled for next Tuesday, December 19, 2023, at 11 a.m. be adjourned for 75 days in order that the parties can continue and, we hope, conclude our efforts to achieve a pretrial disposition. Mr. Bazzi consents to the exclusion of time for that period.

The additional time is needed to finish certain aspects of the negotiation, which likely will not be completed until January 2024 due to scheduling conflict created by the holidays and other commitments, including professional travel.

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Accordingly, the parties jointly respectfully request that the Court adjourn next Tuesday's status conference for a period of 75 days, with Mr. Bazzi consenting to exclusion of that time .

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel
James Roth
Abed Hammoud

JLD/